



KEYSTONE CEMENT COMPANY

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January 27, 2016

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Ms. Diana Escher, Director
Air Protection Division
USEPA, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Mr. Mark J. Wejkszner, P.E.
Regional Air Quality Program Manager
Pennsylvania Department of Environmental Protection
2 Public Square
Wilkes-Barre, PA 18711-0790

**RE: KEYSTONE CEMENT COMPANY | BATH, PENNSYLVANIA
SUMMARY REPORT—EXCESS EMISSIONS & CONTINUOUS MONITORING SYSTEM
PERFORMANCE
FOR SOURCES SUBJECT TO 40 CFR PART 63, SUBPART LLL
REPORTING PERIOD: JULY 1, 2015 THROUGH DECEMBER 31, 2015**

Dear Ms. Escher and Mr. Wejkszner:

Pursuant to 40 CFR Part 63.1354(b)(8), Keystone Cement Company (Keystone) is submitting the attached summary report—excess emissions and continuous monitoring system (CMS) performance (Summary Report) for emissions units subject to the requirements of 40 CFR Part 63, Subpart LLL - National Emissions Standards for Hazardous Air Pollutants (NESHAP) from the Portland Cement Manufacturing Industry (PC MACT). Pursuant to 40 CFR Part 63.1354(b)(9), the clinker cooler emission data summary and CMS performance summary for this reporting period was submitted via the Compliance and Emissions Data Reporting Interface (CEDRI) on-line reporting system.

Pursuant to 40 CFR §63.1351(c), the compliance date for all the requirements that became effective on February 12, 2013 is September 9, 2015. 40 CFR §63.1343(a) and (d) specify that any existing source (as defined in §63.1351), that was subject to a PM or opacity emissions limit prior to September 9, 2010, must continue to meet the emissions limits in effect prior to September 9, 2010 until the compliance date of the amendments. It should be noted that the Pennsylvania Department of Environmental Protection (PADEP) approved an extension of compliance to November 9, 2015 for Keystone's clinker cooler.

In accordance with the requirements of 40 CFR §63.1354(b)(9), Keystone is submitting this report for the semi-annual period from July 1, 2015 through December 31, 2015. However, this summary report covers the portion of the semiannual reporting period that occurred on and after the extended compliance date for the Subpart LLL amendments (i.e., November 9, 2015 through December 31, 2015). A second report, submitted under separate cover, addresses the portion of the semiannual reporting period that occurred on and before extended compliance date of the Subpart LLL amendments (i.e., July 1, 2015 through November 8, 2015).

If you have any questions, please contact me at (610) 837-1881 x3213 or
Scott.McGoldrick@gcpv.com.

Sincerely,



Scott McGoldrick
Manager, Environmental Compliance

Attachment

cc: Stephen P. Holt, P.E., Keystone

ATTACHMENT A
SUMMARY REPORT—EXCESS EMISSIONS & CONTINUOUS MONITORING
SYSTEM PERFORMANCE

Summary Report – Excess Emissions and Continuous Monitoring System Performance

Keystone Cement Company – Bath, PA
Units Subject to 40 CFR Part 63, Subpart LLL
July 1, 2015 through December 31, 2015

1.0 INTRODUCTION

The semiannual reporting requirements for 40 CFR Part 63, Subpart LLL (National Emissions Standards for Hazardous Air Pollutants [NESHAP] from the Portland Cement Manufacturing Industry [PC MACT] affected sources are codified at 40 CFR §63.1354(b)(8), (9), and (10) and §63.1354(c). The general provisions of Part 63 also contain excess emissions and continuous monitoring system (CMS) performance report and summary report requirements at §63.10(e)(3). Pursuant to Table 1 to Subpart LLL, the Excess Emissions and CMS Performance Reports requirements of §63.10(e)(3) are applicable to Subpart LLL affected sources.

The semiannual reporting requirements for Subpart LLL are summarized as follows:

- 40 CFR §63.1354(b)(8) requires the owner or operator of an affected source equipped with a continuous emission monitor to submit an excess emissions and CMS performance report for any event when the continuous monitoring system data indicate the source is not in compliance with the applicable emission limitation or operating parameter limit.
- 40 CFR §63.1354(b)(9) requires the owner or operator to submit a summary report semiannually to the U.S. Environmental Protection Agency (EPA) via the Compliance and Emissions Data Reporting Interface (CEDRI) and also specifies what the electronic report shall include.
- 40 CFR §63.1354(b)(8) and (9) require this semiannual summary report to contain the information specified in 40 CFR 63.10(e)(3)(vi).
- 40 CFR §63.1354(b)(10) requires the owner or operator to submit an excess emissions and continuous monitoring system performance report along with the summary report if the total CMS downtime for any CMS for the reporting period is ten percent or greater of the total operating time for the reporting period.
- 40 CFR §63.1354(c) specifies reporting requirements for failure(s) to meet a standard due to a malfunction.

Each of the semiannual reporting requirements identified above are discussed in greater detail hereafter.

2.0 40 CFR §63.10(E)(3)(VI) SEMIANNUAL SUMMARY REPORT REQUIREMENTS

Each of the 40 CFR §63.10(e)(3)(vi) reporting requirements are cited below. Response to each requirement is provided immediately after the citation.

2.1 The company name and address of the affected source (40 CFR §63.10(e)(3)(vi)(A)):

Keystone Cement Company (Keystone or Facility)
Route 329
P.O. Box A
Bath, PA 18014-0058

2.2 An identification of each HAP monitored at the affected source (40 CFR §63.10(e)(3)(vi)(B)):

1. Particulate matter (PM) as a surrogate for metal HAPs

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2.3 The beginning and ending dates of the reporting period (40 CFR §63.10(e)(3)(vi)(C)):

The reporting period covered by this semiannual summary report is:

- July 01, 2015 through December 31, 2015.

Pursuant to 40 CFR Part 63.1351(c), the compliance date for all the requirements that became effective on February 12, 2013 is September 9, 2015. 40 CFR §§63.1343(a) and (d) specify that any existing source (as defined in §63.1351), that was subject to a PM or opacity emissions limit prior to September 9, 2010, must continue to meet the emissions limits in effect prior to September 9, 2010 until the compliance date of the amendments. It should be noted that the Pennsylvania Department of Environmental Protection (PADEP) approved an extension of compliance to November 9, 2015 for Keystone's clinker cooler.

Keystone has prepared two (2) Subpart LLL semiannual reports for this reporting period. Specifically, this summary report covers the portion of the quarterly reporting period that occurred on and after the extended compliance date for the Subpart LLL amendments (i.e., November 9, 2015 through December 31, 2015). A second report, submitted under separate cover, addresses the portion of the reporting period that occurred before the extended compliance date of the Subpart LLL amendments (i.e., July 1, 2015 through November 8, 2015).

2.4 A brief description of the process units (40 CFR 63.10(e)(3)(vi)(D)):

Keystone operates a preheater/precalciner cement kiln utilizing hazardous waste derived fuels (HWF) in an energy recovery process. As such, the kiln system, including the preheater/precalciner, in-line raw mill, and alkali bypass, is subject to the 40 CFR Part 63, Subpart EEE (Hazardous Waste Combustors MACT). Pursuant to 40 CFR §63.1340(b)(1), kilns, including any associated preheater or precalciner devices, inline raw mills, and alkali bypasses, that burn hazardous waste and are subject to and regulated under Part 63 Subpart EEE are NOT subject to the provisions of the PC MACT. Thus, Keystone's preheater and precalciner devices, kiln, inline raw mill, and alkali bypass are not subject to the PC MACT.

Keystone operates a clinker cooler (Source ID: 227) that is subject to the provisions of the PC MACT. Clinker from the kiln system is sent through the clinker cooler, which is controlled by a baghouse before exhausting to the atmosphere (Emission Point ID: S80). The clinker cooler stack height is approximately 118 feet and the stack diameter is approximately 5.9 feet.

2.5 The emission and operating parameter limitation (OPL) specified in the relevant standard(s) (40 CFR §63.10(e)(3)(vi)(E)):

The emission limitations and OPL specified by Part 63 Subpart LLL for Keystone's clinker cooler are specified at 40 CFR §63.1342(b) and 40 CFR §63.1349(b)(1), respectively. Finish mills and other material handling sources at Keystone are subject to 10% opacity and are not required to be equipped with a continuous emission monitor or CMS.

Clinker Cooler emission limits and OPL

Table 1 to 40 CFR §63.1342(b) stipulates that existing clinker coolers are limited to:

- *Normal operation:* 0.07 lb PM/ton clinker

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- *Startup and shutdown:* Work practices

40 CFR §63.1349(b)(1) requires the establishment of a site-specific 30 operating day rolling average operating limit for each PM continuous parameter monitoring system (CPMS).

- *Clinker Cooler OPL:* 4.15 mA on a 30 operating day rolling average

2.6 The monitoring equipment manufacturer(s) and model number(s) (40 CFR §63.10(e)(3)(vi)(F)):

The manufacturer and model number of the PM CPMS used to demonstrate compliance with the clinker cooler OPL identified in Section 2.5 is provided below. Finish mills and other material handling sources at Keystone are not required to be equipped with a continuous emission monitor or CMS as 40 CFR §63.1350(f) specifies visible emissions tests to demonstrate ongoing compliance.

Clinker Cooler PM CPMS Information

- *Manufacturer:* SICK MAIHAK, Inc.
- *Model No.:* DustHunter SP100 Probe Version

2.7 The date of the latest CMS certification or audit (40 CFR §63.10(e)(3)(vi)(G)):

Clinker Cooler PM CPMS – November 17, 2015

2.8 The total operating time of the affected source during the reporting period (40 CFR §63.10(e)(3)(vi)(H)):

Clinker Cooler – 1,078.78 hours

This summary report covers the portion of the reporting period that occurred on and after the extended compliance date for the Subpart LLL amendments (i.e., November 9, 2015 through December 31, 2015).

2.9 Emission Data Summary (40 CFR §63.10(e)(3)(vi)(I)):

Pursuant to 40 CFR 63.1354(b)(9), the clinker cooler emission data summary for this reporting period was submitted via the CEDRI. Note that the first valid 30 operating day rolling average occurred December 19, 2015 and the source did not operate on the following dates: December 22, 2015 and December 31, 2015.

2.10 CMS Performance Summary (40 CFR §63.10(e)(3)(vi)(J)):

Pursuant to 40 CFR §63.1354(b)(9), the clinker cooler CMS performance summary for this reporting period was submitted via the CEDRI. Note that all calculated 30-operating day rolling average values derived from the clinker cooler PM CPMS were recorded as required during the reporting period.

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2.11 A description of any changes in CMS, processes, or controls since the last reporting period (40 CFR §63.10(e)(3)(vi)(K)):

This report represents the first semiannual summary report for the requirements that became effective on February 12, 2013. Thus, there have been no changes in the CMS, process, or controls since the previous reporting period.

2.12 Responsible Official Certification and Report Date (40 CFR §§63.10(e)(3)(vi)(L) and (M)):

The responsible official certification statement, signature, and report date are provided at the end of this report.

3.0 40 CFR §63.1354(b)(9) SEMIANNUAL SUMMARY REPORT REQUIREMENTS

Each of the 40 CFR §63.1354(b)(9) reporting requirements is paraphrased below. A response to each requirement is provided immediately after the requirements.

3.1 Exceedances of maximum control device inlet gas temperature limits (40 CFR §63.1354(b)(9)(i)):

This requirement applies to a kiln subject to a dioxins and furans (D/F) emissions limitation. Keystone's kiln system, including the preheater and precalciner devices, inline raw mill, and alkali bypass, is subject to the 40 CFR Part 63, Subpart EEE and is neither subject to Subpart LLL D/F emissions limitation nor this requirement.

3.2 Notification of failure to calibrate thermocouples and other temperature sensors (40 CFR §63.1354(b)(9)(ii)):

This requirement applies to a kiln subject to a D/F emissions limitation. Keystone's kiln system, including the preheater and precalciner devices, inline raw mill, and alkali bypass, is subject to 40 CFR Part 63, Subpart EEE and is neither subject to Subpart LLL D/F emissions limitation nor this requirement.

3.3 Notification of any failure to maintain the activated carbon injection system (40 CFR §63.1354(b)(9)(iii)):

This requirement applies to a kiln subject to a D/F emissions limitation that employs sorbent injection as an emission control technique. Keystone's kiln system, including the preheater and precalciner devices, inline raw mill, and alkali bypass, is subject to 40 CFR Part 63, Subpart EEE and is neither subject to Subpart LLL D/F emissions limitation nor this requirement.

3.4 Notification of failure to conduct any combustion system component inspections (40 CFR §63.1354(b)(9)(iv)):

This requirement applies to inspections of the combustion system of a kiln and in-line raw mill. Keystone's kiln system, including the preheater and precalciner devices, inline raw mill, and alkali bypass, is subject to 40 CFR Part 63, Subpart EEE and is neither subject to Subpart LLL nor this requirement.

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3.5 Failures to comply with any provision of the operation and maintenance plan (40 CFR §63.1354(b)(9)(v)):

Keystone developed an operation and maintenance (O&M) plan in accordance with the requirements of 40 CFR Part 63.1347. Keystone has not identified any failures to comply with the provisions of their O&M plan during this reporting period.

3.6 Report all of the calculated 30-operating day rolling average values derived from the CPMS (40 CFR §63.1354(b)(9)(vi)):

This provision requires all of the calculated 30-operating day rolling average values derived from the clinker cooler PM CPMS to be reported within 60 days after the reporting period (i.e., February 29, 2016). The clinker cooler PM CPMS CMS 30-operating day rolling average values for this reporting period were submitted via the CEDRI.

3.7 Date, duration and description of each violation and the specific actions taken for each violation (40 CFR §63.1354(b)(9)(vii)):

Keystone did not identify any violation of an emission standard or OPL during the reporting period.

3.8 Submittal of relative accuracy test audit (RATA) data (40 CFR §63.1354(b)(9)(viii)):

This requirement to submit RATA data does not apply to this semiannual summary report.

3.9 Submissions of PM performance test reports used to set a PM CPMS operating limit (40 CFR §63.1354(b)(9)(ix)):

Keystone submitted the most recent clinker cooler PM performance test report to the Administrator on December 18, 2015.

3.10 Non CEDRI report submittal requirements (40 CFR §63.1354(b)(9)(x)):

All reports not submitted via the CEDRI (i.e., this report) must be sent to the Administrator at the address listed in §63.13 (provided below).

Ms. Diana Escher
Director, Air Protection Division
EPA Region III
1650 Arch Street, Philadelphia, PA 19103

4.0 40 CFR §63.1354(b)(10) Semiannual “Full” Excess Emissions and CMS Performance Report Requirements

The total duration of excess emissions and CMS downtime for the clinker cooler PM CPMS was less than 10% of the total operating time for the reporting period. In accordance with 40 CFR §63.1354(b)(10), the full excess emissions and CMS performance reports are not required during this reporting period. As such, this report, in combination with the information submitted via the CEDRI on line reporting system, represents the summary report.

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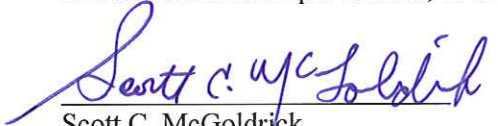
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5.0 40 CFR §63.1354(c) Failure to Meet a Standard Due to a Malfunction

Keystone did not identify any violation of an emission standard or OPL during the reporting period as a result of a malfunction.

6.0 Responsible Official Certification and Report Date

I certify, based on a reasonable inquiry of the persons responsible for preparing this semi-annual report that the information provided is, to the best of my knowledge and belief true, accurate, and complete.



Scott C. McGoldrick
Manager, Environmental Compliance



Report Date